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February 16, 2016

Via Electronic Comment Filing System
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

Re: Farmers Telecommunications Cooperative, Inc. (Filer ID 803427) Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certification for 2015; EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Farmers Telecommunications Cooperative, Inc. please find attached the annual CPNI Compliance Certification for the year 2015 in EB Docket No. 06-36, which has been filed electronically via the Federal Communications Commission's Electronic Comment Filing System on this date.

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.

Dana H. Billingsley

Dana H. Billingsley
Attorney for Farmers Telecommunications Cooperative, Inc.

Enclosure

cc: Fred Johnson

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2016 covering the prior calendar year (2015)

Date filed: February 16, 2016

Name of company covered by this certification: Farmers Telecommunications Cooperative, Inc.

Form 499 Filer ID: 803427

Name of signatory: J. Frederick Johnson

Title of signatory: Executive Vice President & GM

In response to the Federal Communications Commission's ("Commission") rules and policies, Farmers Telecommunications Cooperative, Inc. (the "Company") states as follows:

I, J. Frederick Johnson, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules, as set forth in 47 C.F.R. § 64.2001, *et seq*.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001, *et seq.* of the Commission's rules, including those mandating the adoption of CPNI procedures, training, recordkeeping and supervisory review.

The Company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed _____

Before the
Federal Communications Commission
Washington, D.C. 20554

ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT
OF
FARMERS TELECOMMUNICATIONS COOPERATIVE, INC.

EB Docket No. 06-36

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Farmers Telecommunications Cooperative, Inc. ("Farmers") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001, *et seq.* on behalf of Farmers:

1. I have personal knowledge that Farmers has implemented a system by which the status of a Customer's Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.

2. I have personal knowledge that Farmers obtains written approval for the use of its customers' CPNI and that Farmers has notified its customers of their right to restrict Farmers' use of, disclosure of and access to their CPNI prior to obtaining such written approval. Each customer's record contains a designation identifying whether or not Farmers has obtained, through the processes permitted by the Federal Communications Commission's ("FCC") rules, the customer's approval to use, disclose or permit access to his or her CPNI.

3. I have personal knowledge that Farmers has designated a CPNI Compliance Officer, who is responsible for supervising the use, disclosure, distribution or access to its customers' CPNI, that Farmers trains, at least once annually, its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001, *et seq.* and that Farmers has an express disciplinary process in place to deal with breaches of CPNI.

4. I have personal knowledge that Farmers has implemented procedures to safeguard the disclosure of its customers' CPNI, including the following: procedures for authentication of customers before disclosing CPNI on customer-initiated telephone contacts, online access or business office visits; a customer password and backup authentication system; notification of customer account changes; and notification of security breaches of customer CPNI to law enforcement agencies. In particular, Farmers discloses call detail information ("CDI") in a customer-initiated call only after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record. Farmers discloses CPNI to a customer in person at its retail

location(s) only when the customer presents a valid photo ID and the ID matches the name on the account.

5. I have personal knowledge that Farmers maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Farmers retains all such records for a minimum period of one (1) year.

6. I have personal knowledge that Farmers has established a supervisory review process regarding its compliance with the FCC's rules for outbound marketing situations and that Farmers maintains records of such compliance for a minimum period of one (1) year. Farmers' sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

7. I have personal knowledge that Farmers will maintain records of any discovered breaches, notices to law enforcement, and their responses, for at least two (2) years.

8. I have personal knowledge that Farmers has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

On behalf of Farmers, I represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject Farmers to enforcement action.

Executed on this the 16th day of February, 2016.

FARMERS TELECOMMUNICATIONS
COOPERATIVE, INC.

By: _____

Printed: J. Frederick Johnson

As Its: Executive Vice President & GM